



**Andrea Dobin**

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April 4, 2019

**VIA CM/ECF**

Honorable Michael B. Kaplan  
United States Bankruptcy Court  
Trenton, NJ 08608

Re: In re Yabut, Reynaldo, Case No. 19-10192(MBK)  
Objection to Motion to Compel Trustee to Sell  
Return Date: April 29, 2019, 10am

Dear Judge Kaplan:

I serve as the Chapter 7 Trustee in the above-referenced matter. I have been served with a Motion requesting the Trustee to sell the real estate located at 18 Butterfly Court, Manahawkin, New Jersey. This motion must be denied for the following reasons:

1. There is no equity in the Property as demonstrated by the Notice of Proposed Abandonment;
2. The mortgagee has obtained stay relief and has listed the Property for sale on the April 9, 2019 sheriff sale list for Ocean County with an upset price that vastly exceeds the value of the Property:

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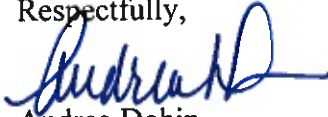
CH 776311	PLAINTIFF THE BANK OF NEW YORK MELLON FKA THE \$1,053,327.07	2
F02445017	DEFENDANT RAYNALDO YABUT ETC., ET ALS	
	ATTORNEY KML LAW GROUP	609-250-0700
	F02445017	KRISTINA MURTHA
SEQ 001	18 BUTTERFLY COURT	STAFFORD TWP. NJ 08050
	Lot: 2.35	Block: 51

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3. The Court has docketed a Certificate of No Objection such that the abandonment has now been finalized. The Trustee could not exercise control over the Property even if she wanted to. It is no longer property of the Estate.

I do not intend to appear to argue this opposition unless directed by the Court. I thank the Court for its consideration.

Respectfully,



Andrea Dobin

AD/to

cc: Yabut Reynaldo  
18 Butterfly Court  
Manahawkin, NJ 08050